

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS,)	
)	
Plaintiff,)	
)	
v.)	No. 20 C 2725
)	
U.S. DEPARTMENT OF HOMELAND)	Judge Rowland
SECURITY, IMMIGRATION AND)	
CUSTOMS ENFORCEMENT,)	
)	
Defendant.)	

JOINT STATUS REPORT

Per the court's December 15, 2020 minute entry (Dkt. 19), the parties in this Freedom of Information Act case jointly submit this status report.

1. The court has become familiar with the two counts in this case. Count I is the traditional FOIA count in which plaintiff Jackie Stevens seeks documents responsive to her FOIA requests to Immigration and Customs Enforcement. Count II is the "pattern or practice" count that has given rise to a dispute between the parties about the propriety of discovery.

2. **Defendants' position on Count I:** Regarding Count I, since the most recent hearing on December 14, 2020, ICE has made two additional productions of documents responsive to Stevens's FOIA requests. The first production contained 241 pages of responsive records plus 3 Microsoft Excel files, and the second production contained 431 pages of responsive records. Additional records are forthcoming, including an anticipated 500-page production later this month. Since this lawsuit was filed, ICE has produced 1,702 pages of responsive records (522 pages in October 2020, 510 pages in November 2020, and 672 pages in January 2021).

3. **Plaintiff's position on Count I:** Count I pertains to six FOIA requests filed in 2018 and 2019. Because Defendants deliberately refused to search, process, and produce responsive documents even after administrative appeals were remanded, Plaintiff was forced to file this civil action hoping to obtain the responsive records. This case was filed on 5-5-2020 and as usual Defendants are slow-walking production hoping that this will turn in yet another FOIA case that drags for 3-6 years with Defendants producing few hundred pages every four to eight months. Despite the fact that this case includes probably thousands of time-sensitive responsive documents, to date – eight months after filing—Defendants have produced fewer than 1200 pages. Plaintiffs respectfully requests that the Court issue an order directing Defendants to complete the entire production of documents by 30 May 2021.

4. Regarding Count II, the question of whether Stevens is entitled to discovery has been fully briefed. Dkt. 16, 20-21.

Respectfully submitted,

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